

The Honorable Karen A. Overstreet  
Hearing Date: December 30, 2013  
Hearing Time: 11:00 a.m.

UNITED STATES BANKRUPTCY COURT  
WESTERN DISTRICT OF WASHINGTON AT SEATTLE

In Re: ) Chapter: 11  
)  
CLI HOLDINGS, INC. dba ALYDIAN, ) Case No. 13-19746-KAO  
)  
Debtor. ) DEBTOR'S RESPONSE TO MOTION TO  
) COMPEL  
)

CLI Holdings, Inc. dba Alydian ("Alydian"), Debtor-In-Possession in the above-captioned chapter 11 case ("Debtor" or "Alydian") by and through its counsel of record, Deirdre Glynn Levin and Keller Rohrback, LLP, responds as follows to Bitvestment's Motion to Compel, on shortened time.

The court is asked to consider the Declaration of Deirdre Glynn Levin, and Exhibit A thereto, and the records and files in this case.

**I. ARGUMENT**

**A. Debtor has Served Documents in Response to Bitvestment's Rule 2004 Order**

On December 27, 2013, Debtor served Bitvestment, through its counsel, a set of documents in response to the court's Rule 2004 Order entered in this case. A copy of the letter responding to each category on the Subpoena is attached to the Declaration of Deirdre Glynn Levin as Exhibit "A".

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1           B. Debtor Objects to Certain Requests for Production

2           The bases on which Debtor objects to certain categories of Bitvestment's requests are set  
3 forth in Exhibit A. As well, due to their sensitive commercial nature, Debtor will produce  
4 certain documents only subject to a confidentiality agreement or protective order.

5           Debtor seeks that the court consider the objections and rule on the propriety of the  
6 requests and the objections.  
7

8                               **II. CONCLUSION**

9           WHEREFORE, the Debtor respectfully requests the court deny the relief requested by  
10 Bitvestment.

11           DATED this 27th day of December, 2013.

12                               KELLER ROHRBACK L.L.P.

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15                               By: /s/Deirdre Glynn Levin  
16                               Deirdre P. Glynn Levin, WSBA #24226  
17                               Attorneys for Debtor  
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